

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

LOIS JENKINS,)
)
Plaintiff,)
)
v.) Case No.: 20-CV-790-HE
)
CSAA INSURANCE EXCHANGE;)
CSAA FIRE AND CASUALTY)
INSURANCE COMPANY d/b/a AAA)
FIRE & CASUALTY INSURANCE)
COMPANY; and AUTOMOBILE)
CLUB OF OKLAHOMA, d/b/a AAA)
OKLAHOMA;)
)
Defendants.)

**JOINT MOTION FOR DISMISSAL OF PLAINTIFF LOIS JENKINS AND
DEFENDANT CSAA FIRE AND CASUALTY INSURANCE COMPANY**

Pursuant to Federal Rule of Civil Procedure 41(a)(2), the parties respectfully request the Court dismiss the remaining Defendant CSAA Fire and Casualty Insurance Company from this litigation without prejudice, subject to the following conditions: (1) any refiling of a claim by Plaintiff Lois Jenkins against Defendant CSAA Fire and Casualty Insurance Company will be filed in the Western District of Oklahoma; *see Grindstaff v. Ace Am. Ins. Co.*, No. CIV-12-670-W, 2013 WL 3457219, at *3 (W.D. Okla. July 9, 2013), and (2) in light of the preceding stipulation, Defendant CSAA Fire and Casualty Insurance Company will waive any fees that it might seek to collect relating to its removal of the litigation. *See Lewis v. Aldoerffer*, No. CIV-17-0229-HE, 2017 WL 11448854, at *1 (W.D. Okla. Aug. 3, 2017). The parties request the Court retain jurisdiction in this case for the limited purpose of enforcing these terms. *Lachney v. Target Corp.*, No. CIV-03-1685-HE, 2010

WL 11509187, at *2 (W.D. Okla. Sept. 16, 2010), citing *Kokkonen v. Guardian Life Ins. Co.*, 511 U.S. 375, 381-82 (1994).

Respectfully Submitted,

/s/ Micah B. Cartwright

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